Remarks

This Application has been reviewed in light of the Final Office Action mailed December 6, 2004. All pending Claims 1-4, 6, 7, 9-11, 13-21, 23, 24, 26-28, 30-36, and 38-43 stand rejected. Although Applicant believes all pending claims are allowable without amendment, independent Claims 1, 18, 32, 33 and 43 have been amended to expedite issuance of a patent from this Application. In addition, new Claim 44 has been added, dependent Claims 9. 26 and 38 have been cancelled, and dependent Claims 2, 6-7, 13, 17, 23-24 and 36 have been amended to conform to the amended independent claims. Applicant also respectfully provides these remarks. Applicant respectfully requests reconsideration and full allowance of all pending claims.

Applicant's Claims are Allowable over *Mukhopadhyay*

The Examiner rejects Claims 1-3, 7, 9, 13-16, 18-20, 24, 26, 30, 32-34, 36, 38, 41, and 43 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,032,158 to Mukhopadhyay et al. ("*Mukhopadhyay*").

Independent Claim 1, as amended, recites in part a change retrieval engine operable to:

> receive information from the data management system identifying a particular business object with which the changed data is associated, a main table including data associated with the particular business object, and key values identifying a plurality of instances of the particular business object, each of the plurality of instances of the particular business object being associated with at least a portion of the changed data;
> access a data model specifying, for the particular business object, references to plural tables associated with the particular business object and managed by the data management system that include data related to the plural instances of the particular business object, the data related to each instance being identifiable in one or more of the plural tables by the key value identifying that instance;
> wherein the plural instances of the particular business object represent different subsets of data related to the particular business object such that the data related to different ones of the plural instances is at least partially different data;
> identify, according to the data model and the information received from the data management system, the plural tables associated with the particular business object;

for each of the plural instances of the particular business object, use the key value associated with that instance to identify, from the plural tables associated with the particular business object, the data in one or more of the plural tables that is related to that instance; [and]

request from the data management system data to be retrieved included in the plural tables identified according to the data model, the requested data to be retrieved including at least a portion of the data identified as related to the plural instances of the particular business object

Independent Claims 18, 32, 33 and 43, as amended, recite substantially similar limitations. *Mukhopadhyay* fails to disclose, teach, or suggest at least these limitations, whether *Mukhopadhyay* is considered alone or in combination with any other cited reference or with information generally available to those of ordinary skill in the art at the time the invention was made, for at least the reasons discussed below.

For example, *Mukhopadhyay* fails to disclose, teach, or suggest an engine operable to "receive information from the data management system <u>identifying a particular business object with which the changed data is associated, a main table including data associated with the particular business object, and key values identifying a plurality of instances of the particular business object,</u> each of the plurality of instances of the particular business object being associated with at least a portion of the changed data," as specifically recited in amended Claim 1. According to the Examiner, *Mukhopadhyay* discloses an engine operable to receive information from a data management system identifying a business object with which changed data is associated, the received information including key values identifying a plurality of instances of the business object, at col. 7, lines 35-67; col. 8, line 59 to col. 9, line 30; and col. 5, line 62 to col. 6, line 9. (Office Action, page 4).

None of these cited portions of *Mukhopadhyay*, nor the remained of *Mukhopadhyay*, discloses receiving information from a data management system that identifies (a) a particular business object associated with the changed data, (b) a main table associated with the particular business object, and (c) key values identifying a plurality of instances of the particular business object, as recited in amended Claim 1.

As another example, *Mukhopadhyay* fails to disclose, teach, or suggest a "plurality of instances of the particular business object" as specifically recited in amended Claim 1. According to the Examiner, because *Mukhopadhyay* teaches that a single change may need to

be propagated to multiple data marts, multiple instances of the changed business object must exist in order to be propagated to such multiple data marts. (Office Action, page 27).

However, amended Claim 1 recites that "the plural instances of the particular business object represent different subsets of data related to the particular business object such that the data related to different ones of the plural instances is at least partially different data." Thus, it is clear that the alleged "instances" of a business object propagated to multiple data marts in *Mukhopadhyay* are clearly not "instances" of a business object as defined in amended Claim 1. To illustrate the distinction, Applicant directs the Examiner to the example of a "business object" and a "plurality of instances" of that business object provided in Applicant's specification. The example business object is a "MATERIAL" business object (which has a corresponding main table denoted as the "MARA" table) and the example instances of the "MATERIAL" business object are multiple types of materials. (Applicant's specification, page 9, line 29 - page 10, line 3). The alleged "instances" of a business object propagated to multiple data marts in *Mukhopadhyay* do not "represent different subsets of data related to the particular business object such that the data related to different ones of the plural instances is at least partially different data," as specifically recited in amended Claim 1.

As yet another example, *Mukhopadhyay* fails to disclose, teach, or suggest "a data model specifying, for the particular business object, references to plural tables associated with the particular business object and managed by the data management system that include data related to the plural instances of the particular business object, the data related to each instance being identifiable in one or more of the plural tables by the key value identifying that instance," as specifically recited in amended Claim 1. If the Examiner does believe such limitations are disclosed by *Mukhopadhyay*, Applicant requests the Examiner indicate with sufficient detail the particular elements of *Mukhopadhyay* that can be equated with such limitations.

As another example, *Mukhopadhyay* fails to disclose, teach, or suggest "for each of the plural instances of the particular business object, use the key value associated with that instance to identify, from the plural tables associated with the particular business object, the data in one or more of the plural tables that is related to that instance," as specifically recited in amended Claim 1. First, as discussed above, *Mukhopadhyay* fails to disclose, teach, or

suggest "plural instances of the particular business object." Moreover, *Mukhopadhyay* fails to disclose, teach, or suggest using key values associated with an instance of the business object to identify data from *one or more* tables that is related to that instance, *much less where such related data may be different for different instances*, as recited in amended Claim 1. If the Examiner does believe such limitations are disclosed by *Mukhopadhyay*, Applicant requests the Examiner indicate with sufficient detail the particular elements of *Mukhopadhyay* that can be equated with such limitations.

Applicant respectfully notes that "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987); M.P.E.P. § 2131. In addition, "[t]he elements must be arranged as required by the claim." *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989); *In re Bond*, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990); M.P.E.P. § 2131. As illustrated above, *Mukhopadhyay* fails to disclose, either expressly or inherently, each and every limitation recited in Applicant's Claim 1, as is required under the M.P.E.P. and governing Federal Circuit cases.

For at least these reasons, Applicant respectfully requests reconsideration and allowance of amended Claim 1, together with all claims that depend therefrom. In addition, for at least the reasons stated with regard to Claim 1, Applicant respectfully requests reconsideration and allowance of amended independent Claims 18, 32, 33 and 43, together with all claims that depend therefrom.

All of Applicant's arguments and amendments are without prejudice or disclaimer. Additionally, Applicant has merely discussed example distinctions from the *Mukhopadhyay* reference. Other distinctions may exist, and Applicant reserves the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicant does not acquiesce to the Examiner's additional statements. The example distinctions discussed by Applicant are sufficient to overcome the anticipation rejections.

Conclusion

Applicant respectfully submits that the present Application is in condition for allowance and favorable notice thereof is requested.

Applicants enclose a Request for Continued Examination (RCE) Transmittal along with a check in the amount of $790.00 for the RCE fee required under 37 C.F.R. 1.17(e). Applicants believe there are no additional fees due at this time; however, the Commissioner is hereby authorized to charge any fees to or credit any overpayments Deposit Account No. 02-0384 of Baker Botts L.L.P. in order to effectuate this filing.

If the Examiner believes a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Christopher W. Kennerly, Attorney for Applicant, at the Examiner's convenience at (214) 953-6812.

Respectfully submitted,

BAKER BOTTS L.L.P.
Attorneys for Applicant

Eric Zll.

Eric M. Grabski
Reg. No. 51,749

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Correspondence Address:

Customer Number   05073